

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

ROBERT KEEGAN LEA, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

BAKER HUGHES, INC.,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Action No. 3:13-CV-00447

**JOINT NOTICE OF SETTLEMENT**

Pursuant to Local Rule 16.3, Plaintiff and Defendant notify the Court that the parties have reached an agreement to resolve this matter. Among other things, the agreement calls for the parties to prepare and submit a joint motion for preliminary approval of the settlement agreement terms, which will include, among other things, the proposed certification of settlement classes under the FLSA and Fed. R. Civ. P. 23, the issuance of notice to class members, a final approval hearing, and the issuance of a final judgment that dismisses this matter. The parties anticipate submitting the joint motion for preliminary approval in the next 30 days. The parties further anticipate requesting a short telephone conference with the Court in the near future to address certain issues relating to the settlement approval motions.

The purpose of the settlement is to resolve disputed claims. Neither party admits to any liability and all liability is expressly denied.

Respectfully submitted,

BRUCKNER BURCH PLLC

/s/ Rex Burch

By: \_\_\_\_\_

Richard J. (Rex) Burch  
Texas Bar No. 24001807  
S.D. Tex. No. 21615

8 Greenway Plaza, Suite 1500  
Houston, Texas 77046  
713-877-8788 – Telephone  
713-877-8065 – Facsimile  
[rburch@brucknerburch.com](mailto:rburch@brucknerburch.com)

Counsel for Plaintiff

/s/ Michael J. Muskat

MICHAEL J. MUSKAT  
Attorney-in-Charge  
State Bar No. 24002668  
S.D. Tex. Bar No. 22816  
MUSKAT, MARTINEZ & MAHONY, LLP  
1201 Louisiana Street, Suite 850  
Houston, Texas 77002  
Telephone: 713-987-7850  
Telecopier: 713-987-7854

Counsel for Defendant

OF COUNSEL:

GABRIELLE S. MOSES  
State Bar No. 24063878  
S.D. Tex. Bar No. 1068217  
MUSKAT, MARTINEZ & MAHONY, LLP  
1201 Louisiana Street, Suite 850  
Houston, Texas 77002  
Telephone: 713-987-7850  
Telecopier: 713-987-7854

**CERTIFICATE OF SERVICE**

This is to certify that on June 25, 2014, a true and correct copy of the foregoing document has been served on Plaintiff's counsel of record via the Electronic Case Filing system.

/s/ Michael J. Muskat  
ATTORNEY FOR DEFENDANT